BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Review of the Emergency Alert System	)	EB Docket No. 04-296
	)	
	)	

COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Telecommunications Industry Association ("TIA") hereby submits comments in response to the Notice of Proposed Rulemaking in the above-captioned proceeding.[1]

I.   INTRODUCTION

TIA is the leading trade association representing the communications and information technology industry, with 700 member companies that manufacture or supply the products and services used in global communications. TIA represents its members on the full range of public policy issues affecting the communications industry, forges consensus on industry standards, and organizes and co-owns SUPERCOMM, the world's largest annual communications exhibition and conference. Among their numerous lines of business, TIA member companies design, produce and deploy

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[1] *Notice of Proposed Rulemaking*, FCC 04-189 (released August 12, 2004) ("NPRM").

communications network and terminal equipment. As a result, TIA has substantial

interest in current and future Federal Communications Commission ("FCC" or

"Commission") decisions related to the Emergency Alert System ("EAS").

In this NPRM, the Commission seeks comment on whether the EAS, in its present

form, is the most effective mechanism for warning the American public of an emergency

and, if not, on how the EAS can be improved. Additionally, the NPRM examines

whether the EAS should be extended to other services.

TIA is pleased to assist the Commission with its review of the EAS. TIA supports

the Commission's desire to promote an efficient and technologically current public alert

and warning system. Further, TIA believes that the current EAS system could be

improved and should not be phased out entirely in favor of a new emergency alerting

model. In the comments that follow, TIA limits its response to issues related to the

Media Common Alert Protocol ("MCAP").

II.   DISCUSSION

The Commission contemplates integrating the EAS into a Public Alert and

Warning ("PAW") "system of systems" by adopting and using a single, integrated

interface that would link an emergency manager and all emergency notification and

delivery systems, regardless of the technology on which a particular system is based.

With this goal in mind, the Media Security and Reliability Council's ("MSRC") Future

Technologies/Digital Solutions Task Force recommends that the government coordinate

development of a Media Common Alert Protocol ("MCAP").

MSRC is an industry-led Federal Advisory Committee created by the

Commission and comprised of leaders from the radio, television, multi-channel video,

public safety and disabled communities. MSRC was formed following the events of September 11, 2001, to study, develop, and report on Best Practices designed to ensure the continued operations and security of media facilities in times of a national emergency.

A Media Common Alert Protocol should: (1) be designed to deliver emergency messages via digital networks; (2) flow over all methods of digital transport; (3) be received by all digital receivers; and (4) be optimized for point-to-multi-point networks and devices only. MSRC also suggests that key attributes of the MCAP should be addressability, scalability, interoperability and prioritizing. MSRC recommends that industry organizations and companies should develop standards and specifications for carriage of MCAP on various media.

TIA believes that there exists a clear need for a consistent standards system for the EAS that can be deployed easily, voluntarily and efficiently. Accordingly, TIA fully supports the adoption of a MCAP.

A.   The Commission in coordination with other appropriate Federal Agencies, including the Department of Homeland Security, should coordinate the development of a digital transmission coding system using a Media Common Alert Protocol.

A Media Common Alert Protocol can transmit more information than the current EAS system. In addition to its public alerting function, a MCAP could also support special alerts directly targeting public safety/first responder officials. Moreover, MCAP should support multi-lingual and special needs populations, including applications for the hearing impaired and visually impaired

Without a MCAP, digital television broadcasters would have to transmit EAS on all program streams. If MCAP is adopted and deployed by digital television

broadcasters, an alerting messaging protocol can be inserted at the transmitting point rather than the program origination point and could be selectively received by those receivers in the geographic area impacted by the emergency. Until MCAP is adopted all program streams must be interrupted.

B. MCAP should be standardized and non-proprietary.

Intellectual property issues could stifle the development and deployment of a digital transmission coding system using the medial common alert protocol. Thus, the MCAP should be non-proprietary.

C. Participation by state and local governments in the EAS should be mandatory, not voluntary.

EAS use as part of a public warning system at the state and local levels, while encouraged by the Commission, is voluntary for alerts other than Presidential alerts. As noted in the NPRM, although Federal, state, and local governments, and the consumer electronics industry have taken steps to ensure that alert and warning messages are delivered by a responsive, robust and redundant system, the permissive nature of EAS participation at the state and local level has resulted in an inconsistent application of EAS and reduced its effectiveness as a component of an overall public alert and warning system. Thus, TIA believes that state and local participation in EAS should be made mandatory.

III.   CONCLUSION

TIA applauds the Commission's ongoing efforts to promote an efficient and technologically current public alert and warning system. TIA member companies design, develop and manufacture communications equipment, including systems that are subject to, and affected by, the Commission's regulatory oversight. TIA therefore has a direct and substantial interest in the design and deployment of the Emergency Alert System and, more specifically, in the outcome of the issues addressed in this proceeding. TIA requests that the Commission take into consideration the views expressed above.

Respectfully submitted,

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